REMARKS

Claim 1 has been amended to claim precisely what the cited reference to Mandal says it cannot do. Namely, Mandal is cited as teaching coalescing writes. This Mandal does appear to do, but he only coalesces burst-type writes wherein the information written is consecutive and, therefore, can be easily found and coalesced.

Random or non-burst writes are not coalesced and, instead, the reference explicitly states that "sustained random throughput is ultimately limited by the underlying disk speed." Mandal at p. 71. In other words, in the case of random or non-burst writes, no improvement was possible with the cited reference and, therefore, speed was reduced.
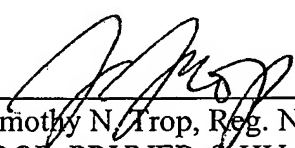
With the claimed invention, non-burst writes can be coalesced as well, providing significant improvement, as recognized by Mandal, even though Mandal was never able to achieve the claimed result.

Therefore, reconsideration is respectfully requested.

Respectfully submitted,

Date: 3/22/06

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